



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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December 5, 2024

**BY E.C.F.**

Honorable Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Anees Hasnain, et al. v. City of New York, et al., 24-CV-6221 (JLR)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing defendant City of New York in this matter. Defendant City of New York writes to respectfully request that the Court grant an extension of time for the City, defendant Officers Allyson Echavarria and Nicholas Albergo, and all newly added defendants to answer, or otherwise respond to, the Amended Complaint, from December 9, 2024 to the date when the response of the last newly added defendant who is served is due. Counsel for plaintiff, Remy Green, Esq., consents to this request. This is the City of New York's first request for an extension of time to answer, or otherwise respond to, the Amended Complaint.

By way of relevant background, plaintiff filed the Amended Complaint adding new defendant Officers Freddy Suazo, Gianfranco Rubino, Benjamin Beiro, Robert Livingston, Angel Amaya, Jason Castillo, Nicholas Noto, Nicholas Blake, Johnny Solorzano and Diana Schutz on September 18, 2024. (Dkt. No. 24). A review of the docket indicates that newly named defendant Gianfranco Rubino was served on December 5, 2024. (Dkt. No. 31). The docket does not indicate that any of the other newly added defendants have been served.

An extension of time for the City, defendant Officers Allyson Echavarria and Nicholas Albergo, and all newly added defendants to answer or otherwise respond will afford time for the remaining newly added defendants to be properly served with the Amended Complaint. This in

turn will permit all newly added defendants (assuming that the Office of the Corporation Counsel undertakes representation of newly added defendants Officers Freddy Suazo, Benjamin Beiro, Robert Livingston, Angel Amaya, Jason Castillo, Nicholas Noto, Nicholas Blake, Johnny Solorzano and Diana Schutz as well as Officer Gianfranco Rubino and assuming they are all properly served) to submit one responsive pleading after the last newly added defendant is served. This would benefit the Court and the parties as it would minimize the need to file multiple answers to the Amended Complaint. Also, having one response would avoid any potential confusion that may arise with respect to defendants' claims and defenses.

For the foregoing reasons, defendant City respectfully requests, with plaintiffs' consent, that the Court grant an extension of time for the City, defendant Officers Allyson Echavarria and Nicholas Albergo, and all newly added defendants to answer or otherwise respond to the Amended Complaint in this matter, from December 9, 2024 to the date when the response of the last newly added defendant who is served is due.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Joseph M. Hiraoka, Jr.

Joseph M. Hiraoka, Jr.

*Senior Counsel*

Special Federal Litigation Division

cc: **By E.C.F.**  
All Counsel of Record